

WEIL, GOTSHAL & MANGES LLP  
Stephen Karotkin (*pro hac vice*)  
(stephen.karotkin@weil.com)  
Ray C. Schrock, P.C. (*pro hac vice*)  
(ray.schrock@weil.com)  
Jessica Liou (*pro hac vice*)  
(jessica.liou@weil.com)  
Matthew Goren (*pro hac vice*)  
(matthew.goren@weil.com)  
767 Fifth Avenue  
New York, NY 10153-0119  
Tel: 212 310 8000  
Fax: 212 310 8007

KELLER BENVENUTTI KIM LLP  
Tobias S. Keller (#151445)  
(tkeller@kbbkllp.com)  
Jane Kim (#298192)  
(jkim@kbbkllp.com)  
650 California Street, Suite 1900  
San Francisco, CA 94108  
Tel: 415 496 6723  
Fax: 650 636 9251

*Attorneys for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY  
DEFAULT ON DEBTORS' OMNIBUS  
MOTION PURSUANT TO 11 U.S.C.  
§§ 105(a) AND 363(b) AND FED. R.  
BANKR. P. 9019 FOR AN ORDER  
(I) APPROVING DE MINIMIS  
SETTLEMENTS WITH CONSUMERS TO  
RESOLVE CPUC PROCEEDINGS AND  
(II) GRANTING RELATED RELIEF**

**[Re: Docket No. 7761]**

**REQUEST FOR ENTRY OF ORDER BY DEFAULT**

PG&E Corporation and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (each, a “**Debtor**,” and collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Debtors’ Omnibus Motion Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019 for an Order (I) Approving De Minimis Settlements with Consumers to Resolve CPUC Proceedings and (II) Granting Related Relief* filed by the Debtors on June 3, 2020 [Docket No. 7761] (the “**Motion**”).

**RELIEF REQUESTED IN THE MOTION**

The Motion seeks entry of an order (i) approving the De Minimis CPUC Settlement Agreements (as defined in the Motion), identified in **Exhibit A** to the Motion, entered into by and among the Utility and the Claimants (as defined in the motion) to resolve certain de minimis claims and causes of action arising out of or relating to various proceedings pending before the California Public Utilities Commission, and (ii) granting related relief.

A proposed order (the “**Proposed Order**”) was attached as **Exhibit B** to the Motion. The order being submitted is different from the Proposed Order attached to the Motion in that the words “as provided herein” have been removed from paragraph 2 of the order to clarify that the De Minimis CPUC Settlement Agreements are not described in or modified by the order.

**NOTICE AND SERVICE**

A *Notice of Hearing on Debtors’ Omnibus Motion Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019 for an Order (I) Approving De Minimis Settlements with Consumers to Resolve CPUC Proceedings and (II) Granting Related Relief* was filed concurrently with the Motion on June 3, 2020 [Dkt. No. 7763] (the “**Notice of Hearing**”). The Motion, the supporting declaration of Steven Frank [Dkt. No. 7762], and the Notice of Hearing were served as described in the Certificate of Service of Alain B. Francoeur, filed on April 8, 2020 [Dkt. No. 7836]. The deadline to file responses

1 or oppositions to the Motion has passed, and no responses or oppositions have been filed with the  
2 Court or received by counsel for the Debtors.

3 **DECLARATION OF NO OPPOSITION RECEIVED**

4 The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

5 1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the  
6 Debtors.

7 2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that  
8 no response or opposition has been filed with respect to the Motion.

9 3. This declaration was executed in Sunnyvale, California.

10 WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the  
11 form attached to the Motion, granting the Motion as set forth therein.

12  
13 Dated: June 18, 2020

**WEIL, GOTSHAL & MANGES LLP**  
**KELLER BENVENUTTI KIM LLP**

14  
15 /s/ Thomas B. Rupp  
Thomas B. Rupp

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17 *Attorneys for Debtors and Debtors in Possession*  
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